

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT AKRON**

| | | |
|------------------------------|---|-------------------------------|
| In re: |) | Case No. 19-50681 |
| |) | |
| |) | Chapter 13 Proceedings |
| Christopher D. Janok, |) | |
| |) | Judge Alan M. Koschik |
| Debtor(s). |) | |

RESPONSE TO MOTION TO DISMISS

Now comes the Debtor, Christopher D. Janok by and through his attorney, David A. Mucklow and states as follows in Response to the Chapter 13 Trustee's Motion to Dismiss this case:

1. As of the date of this Response, the Debtor has amended the Chapter 13 plan to increase the plan payment and address the treatment of secured claims. In addition, the Debtor has provided the Trustee's office with the requested bank statements.

2. The Debtor started a new job on August 12, 2019 and will provide pay-stubs as soon as they are available, and amend Schedules I & J.

Wherefore, the Debtor prays for an order denying the Trustee's motion to dismiss at this time.

Respectfully submitted by:

/s/ David A. Mucklow
DAVID A. MUCKLOW (#0072875)
Attorney for Debtor
919 E. Turkeyfoot Lake Road
Suite B
Akron, OH 44312
(330) 896-8190
(330) 896-8201
davidamucklow@yahoo.com

CERTIFICATE OF SERVICE

I certify that on or about 16th day of August, 2019 that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice list:

- Keith Rucinski efilings@ch13akron.com, krucinski@ecf.epiqsystems.com
- United States Trustee (Registered address)@usdoj.gov

I certify on or about 16th day of August, 2019 that a true and correct copy of the foregoing was sent via U.S. regular mail or certified mail to the persons listed below.

Christopher D Janok
1233 Nola Avenue
Barberton, OH 44203

/s/ David A. Mucklow
DAVID A. MUCKLOW, (#0072875)